

brownrudnick

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September 14, 2022

The motion to seal is **GRANTED**. The confidential business information is of the type previously approved for redactions and the redactions are narrowly tailored. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). The Clerk of Court is respectfully directed to maintain Dkt. No. 219 under seal, with access limited to the parties listed in the Appendix at Dkt. No. 223, and to close the motion at Dkt. No. 217.

VIA ELECTRONIC FILING

Honorable Lorna G. Schofield United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Dated: September 20, 2022 New York, New York

> LORNA G. SCHOFIELD UNITED STATES DISTRICT JUDGE

Re: Kewazinga Corp. v. Google LLC, Case No. 1:20-cv-1106-LGS (S.D.N.Y.)

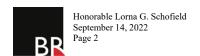
Request for Permission to Redact Kewazinga's Opposition to Google's Letter on Proposed Summary Judgment

Dear Honorable Judge Schofield:

Plaintiff Kewazinga Corp. ("Kewazinga") respectfully requests permission to file a redacted version of its concurrently filed Opposition to Defendant Google LLC's ("Google") Letter on Proposed Summary Judgment ("Letter"), with an unredacted version to be filed under seal. Kewazinga makes this request pursuant to the Local Rules of the Southern District of New York, The Notice Regarding Privacy and Public Access to Electronic Civil and Criminal Case Files of the Southern District of New York, and Your Honor's Individual Rule I(D)(3). Kewazinga understands that the Letter may include information which Google has designated as confidential, and that Google may seek to redact. Although Kewazinga cannot demonstrate that the material designated by Google should be kept under seal, Kewazinga does not oppose Google's position as to those designations. As such, Kewazinga anticipates that Google will file a letter in support of this motion to seal.

Specifically, Kewazinga requests an order granting leave to file under seal the portions as listed and identified below:

Portion to Be Filed Under Seal	Designating Party
Highlighted portions in yellow of the Letter at pgs. 1 and 2.	Google



Dated: September 14, 2022

/s/ Ian G. DiBernardo

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cc: All Counsel (by ECF Filing)